

Title 20 Administrative Requirements Creating Compliance Costs School Improvement Plans and Accountability (511 IAC 6.2)

The regulations in 511 IAC 6.2 create significant administrative requirements through mandatory school improvement planning processes. These include:

1. Detailed documentation requirements for improvement plans
2. Reporting mechanisms that require staff time and resources
3. Grant application processes with specific requirements as outlined in 511 IAC 6.2-4-4

From a fiscal conservative perspective, these requirements create administrative costs without necessarily improving educational outcomes, as staff must dedicate time to compliance rather than instruction.

Waiver Processes (IC 20-31-4.1-9)

The compliance waiver system itself creates administrative burden:

1. Schools must prepare detailed waiver requests
2. The state board must prepare annual reports on waiver requests by November 1 each year
3. Schools must document how the waiver will improve educational outcomes

While intended to provide flexibility, the process of requesting waivers creates its own layer of administrative work and compliance costs.

Innovation Network Schools Administrative Fees (IC 20- 25.7-4-6)

Even with the cap on administrative fees (limited to 1% of state tuition support for agreements after June 30, 2023), these provisions create compliance costs through:

1. Contract negotiation requirements
2. Documentation of service agreements
3. Separate accounting for administrative fees

Special Education Excess Cost Funding (511 IAC 7-47)

The process for obtaining excess cost funding for special education creates significant administrative burden:

1. Schools must complete detailed applications following the division's procedure manual

2. Documentation requirements for proving services are necessary
3. Contract requirements for receiving funds
4. Restrictions on retroactive approval creating timing pressures

As noted in 511 IAC 7-47-1(b), "The division of special education must establish an application process described in a procedure manual that includes requirements for applications of excess cost funding." This creates an entire administrative framework that schools must navigate.

Vacant School Building Transfer Requirements (IC 20-26-7.1-9)

The requirements for transferring vacant school buildings to charter schools create compliance costs through:

1. Documentation requirements for the transfer process
2. Potential penalties for non-compliance
3. Administrative procedures for handling proceeds from sales

Recommendations from a Fiscal Conservative Perspective

From a fiscal conservative viewpoint, potential reforms might include:

1. Consolidating reporting requirements across multiple sections of Title 20
2. Creating a streamlined waiver process with fewer documentation requirements
3. Allowing more local discretion in how compliance is documented
4. Reducing the frequency of required reports and plans
5. Eliminating duplicative oversight mechanisms between state and local authorities

Would you like me to explore any of these areas in more detail, or

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Would you like me to explore any of these areas in more detail, or are there other specific administrative requirements you'd like me to address?

Most Time-Consuming Reporting Requirements in Title 20

Based on the provided documents, I can identify several reporting requirements in Title 20 that create significant administrative burden for school districts with questionable educational benefits:

1. School Accountability Reporting (511 IAC 6.2)

The School Performance and Improvement Accountability regulations create substantial administrative work through:

- Detailed documentation for school improvement plans
- Complex reporting mechanisms for performance metrics
- Appeals processes for category placement that require extensive documentation

As noted in 511 IAC 6.2-6-12, schools must develop "criteria for a school or school corporation to appeal its category placement based on objective factors" which creates an additional layer of documentation and reporting.

3. Compliance Waiver Reporting (IC 20-31-4.1-9)

The state board must prepare annual reports on compliance waiver requests by November 1 each year, which creates upstream reporting requirements for schools seeking waivers. The process of requesting waivers itself creates administrative burden as schools must document:

- How the waiver will improve educational outcomes
- Detailed justifications for the waiver
- Follow-up reporting on waiver implementation

4. Education Fund Transfer Reporting (IC 20-19-7)

When schools fail to meet education fund transfer targets, they face extensive reporting requirements:

"Upon receipt of the department notice to a school corporation under section 9 of this chapter, the school corporation's superintendent and financial personnel, including the school's business officer, shall prepare and submit explanatory documentation within ninety (90) days..."

This documentation must explain:

7. Why they failed to meet targets
8. Steps for future compliance

9. Detailed financial information

If deemed unsatisfactory, schools must then appear before the Distressed Unit Appeal Board (DUAB) to explain:

- Total combined expenditures
- Student instructional expenditures
- Noninstructional expenditures
- Various compensation expenditures
- Prior attempts to seek assistance

5. Special Education Reporting (511 IAC 7-46-2)

The special education child count procedures require schools to:

- Conduct detailed December 1 counts
- Report cumulative counts of students receiving homebound instruction
- Submit certification that the count is accurate
- Follow specific procedures established by the Department of Education

6. Reading Deficiency Reporting (IC 20-32-8.5-2)

Schools must report:

- Literacy interventions for at-risk students
- Follow a "standard reporting process and reporting window" established by the department

Administrative Burden Analysis

According to the Indiana K-12 Data Governance Comprehensive Plan [14]:

"Reporting timelines can lead to schools submitting similar datasets multiple times, but in varying formats. While some level of redundancy is unavoidable given the distinct purposes each agency serves, these overlapping requirements still add unnecessary administrative burdens on schools." The plan further notes that:

"Each agency may require similar data for distinct purposes, leading to overlapping requests from schools. While these redundancies can ensure data are tailored to specific needs, they also create inefficiencies and increase the administrative burden on schools."

Redundant Student Safety Regulations in Title 20

Based on the provided knowledge entries, I can identify several areas where student safety regulations in Title 20 appear to be redundant or duplicative:

1. Emergency Preparedness Requirements

There are overlapping emergency preparedness requirements across different sections of Title 20:

- In 511 IAC 7-36 (Special Education Rules), schools must develop "special warning and evacuation provisions" for students with disabilities that:
 - "address individual needs of students"
 - "be reviewed on an annual and as needed basis"
 - "be implemented during tornado (shelter) preparedness drills, fire drills, and manmade occurrence disaster drills as required by IC 20-34-3-20"
- These requirements overlap with general school safety plans required elsewhere in Title 20, creating duplicative planning processes for the same emergency scenarios.

2. Sudden Cardiac Arrest Provisions

The automated external defibrillator (AED) requirements in IC 20 contain redundant reporting and documentation requirements:

- Schools must document the location of AEDs
- Schools must inform "all individuals who are coaching or providing leadership at the event in which students have an increased risk of sudden cardiac arrest of the location of the automated external defibrillator (AED)"
- Schools must maintain records of this notification

These requirements create multiple documentation processes for the same safety equipment.

3. School Discipline and Safety Reporting

There are overlapping reporting requirements related to school discipline and safety:

- IC 20-33-8-20 contains provisions about student expulsion and discipline
- Other sections require reporting on "safe and disciplined learning environment for students and teachers"
- The federal requirements (as seen in Web search result #16) require reporting on "incidences of bullying and harassment" and "discipline practices that remove students from the classroom"

These create multiple reporting streams on essentially the same student safety information.

4. Physical Restraint and Seclusion Reporting

The requirements for reporting incidents involving physical restraint create redundant documentation:

- Schools must maintain "a copy of an incident report" to be "sent to the student's parent after the student is subject to a procedure"
- Schools must also document these incidents for state reporting purposes
- Schools must maintain training records on "the safe use of physical restraint and seclusion"

5. Special Education Safety Requirements

The special education rules contain safety provisions that duplicate general education requirements:

- 511 IAC 7-36 requires special education-specific emergency plans
- These plans must be integrated with the general school emergency plans required under 511 IAC 6.1-2-2.5
- Both sets of plans must be reviewed and updated regularly

Recommendations for Streamlining

1. **Consolidate Emergency Planning Requirements:** Create a single comprehensive emergency planning framework that includes provisions for students with disabilities, rather than maintaining separate planning processes.
2. **Unified Safety Reporting System:** Develop a single reporting mechanism for all school safety incidents that satisfies both state and federal requirements, rather than requiring schools to report similar information through multiple channels.
3. **Streamline AED Documentation:** Simplify the documentation requirements for AED placement and notification by creating a single documentation process that satisfies all regulatory requirements.
4. **Integrate Physical Restraint Reporting:** Create a unified incident reporting system for physical restraint that satisfies both parent notification and state reporting requirements with a single documentation process.
5. **Harmonize Special Education and General Education Safety Requirements:** Align the safety requirements for special education with general education requirements to eliminate duplicative planning and documentation.

Redundant Safety Documentation Requirements in Title 20

Based on the knowledge entries provided, I can identify several safety requirements in Title 20 that create unnecessary administrative burden through duplicative documentation processes:

1. Physical Restraint and Seclusion Documentation

The documentation requirements for physical restraint and seclusion create multiple overlapping processes:

- According to IC 20, schools must implement "a documentation and recording requirement governing instances in which procedures [for restraint or seclusion] are used, including:
 - (i) how every incident will be documented and debriefed;
 - (ii) how responsibilities will be assigned to designated employees for evaluation and oversight; and
 - (iii) designation of a school employee to be the keeper of such documents."
- Additionally, "the student's parent must be notified as soon as possible when" restraint or seclusion is used, creating a separate notification process for the same incident.
- These requirements create at least three separate documentation streams for a single restraint incident: the incident documentation, the debriefing documentation, and the parent notification.

3. Special Education Emergency Procedures

The special education rules create duplicative emergency planning requirements:

- Special education rules require specific emergency procedures for students with disabilities.
- These must be integrated with the general school emergency plans required under other sections of Title 20.
- This creates parallel documentation processes for emergency planning.

4. Special Education Child Count Reporting

The special education child count process creates multiple documentation requirements:

- According to 511 IAC 7-46-2, schools must complete:
 - "A nonduplicated count of students receiving a free appropriate public education consistent with the requirements of this article in one (1) of the programs for severe disabilities"
 - "A nonduplicated count of students receiving a free appropriate public education consistent with the requirements of this article in one (1) of the programs for mild and moderate disabilities"
 - "A duplicated count of students in programs for communication disorders"
 - "A cumulative count of students who received homebound instruction"
- For this process, schools must:

- Submit the child count report by a specified date
- "Obtain certification from each public agency that the child count report submitted by the public agency: (A) is accurate; and (B) meets all state reporting requirements"
- Maintain documentation that protects personally identifiable information

This creates multiple documentation streams for tracking essentially the same student population.

5. Health and Safety Emergency Reporting

The provisions for reporting health and safety emergencies create overlapping requirements:

- IC 20 allows schools to "disclose or report on the education records of a child, including personally identifiable information contained in the education records, without the consent of the child's parent to appropriate officials in cases of health and safety emergencies"
- This creates a separate documentation process from the standard emergency response procedures
- Schools must maintain records of both the emergency response and the disclosure of information

Recommendations for Streamlining

1. **Unified Restraint/Seclusion Documentation:** Create a single documentation form that satisfies incident recording, debriefing, and parent notification requirements.
2. **Consolidated Safety Plan Framework:** Establish a single comprehensive safety plan format that satisfies all regulatory requirements rather than having multiple potential compliance paths.
3. **Integrated Emergency Planning:** Develop a unified emergency planning process that incorporates special education considerations rather than maintaining parallel planning processes.
4. **Streamlined Special Education Reporting:** Create a single reporting mechanism for special education students that captures all required information in one process.
5. **Consolidated Emergency Disclosure Process:** Develop a unified process for emergency response and information disclosure that reduces duplicative documentation.

Would you like me to explore any of these areas in more detail, or would you prefer information about other potentially redundant safety documentation requirements in Title 20?

1. School Building Usage and Closure Documentation

The provisions in IC 20-26-7-47 create multiple overlapping documentation requirements for school building usage:

- Schools must conduct "a review of school building usage" to determine underutilization
- For buildings identified as underutilized, schools must document:
 - Historical usage ("at any time the school building had been used for classroom instruction")
 - Current usage patterns for "the current school year and the two (2) school years immediately preceding"
 - Capacity analysis of other buildings to demonstrate "sufficient capacity to take the students"
 - Travel time analysis showing buildings "that does not require more than twenty (20) minutes of travel time"
- Additionally, schools may need to create a "transitional plan adopted by the governing body and approved by the department" for alternative uses

This creates multiple documentation streams for essentially the same building utilization information.

2. Building Standards Compliance

The building standards requirements in Title 20 create duplicative documentation:

- According to the knowledge entries, the state board must compile guidelines for "preferred location and building practices for school corporations" including:
 - Standards for "enhancing health, student safety, accessibility, energy efficiency, operating efficiency, and instructional efficacy"
 - Guidelines for "minimum acreage, cost per square foot or cost per ADM, technology infrastructure, building materials, per student square footage, and general space requirements"
 - Additional guidelines for "efficient and cost effective construction"
- Schools must document compliance with these multiple sets of standards, creating overlapping documentation requirements for the same building projects.

3. Special Management Team Building Requirements

For schools under intervention, 511 IAC 6.2-9-6 creates additional building-related documentation requirements:

- The special management team must document agreements with the school corporation for:
 - "Custodial, maintenance, groundskeeping, and other services"

- "Educational and administrative technology and technology support"
- Transportation facilities
- These requirements create parallel documentation processes for building maintenance and usage that duplicate normal building documentation requirements.

4. Vacant Building Transfer Documentation

IC 20-26-7.1-9 (referenced in the knowledge entries) creates multiple documentation requirements for vacant school buildings:

- Schools must document that a building meets the definition of "covered school building"
- Schools must document the square footage usage for administrative purposes ("at least fifty percent (50%) of the square footage of the school building must be used for offices")
- Schools must document that "the personnel headquartered in the school building must consistently use the space for office purposes"
- Schools must document that "the occupancy cost of using the school building cannot be more than comparable office space that is available in the school district"

This creates multiple documentation streams for essentially the same building utilization information.

5. Building Construction Documentation

IC 20-47-2-22 creates potential confusion about documentation requirements:

- The section states that "this chapter shall be construed as being supplemental to all other laws covering the acquisition, use, and maintenance of school buildings"
- However, it also states that "it is not necessary to comply with other laws concerning the acquisition, use, and maintenance of school buildings by school corporations except as specifically required in this chapter"

This creates uncertainty about which documentation requirements apply, potentially leading schools to complete multiple documentation processes to ensure compliance.

Recommendations for Streamlining

1. **Unified Building Usage Documentation:** Create a single comprehensive building usage documentation process that satisfies all regulatory requirements rather than maintaining parallel processes.
2. **Consolidated Building Standards:** Establish a single set of building standards that incorporates all regulatory requirements rather than having multiple overlapping standards.

3. **Streamlined Vacant Building Process:** Develop a unified process for documenting vacant building status and potential uses that reduces duplicative documentation.
4. **Clarified Construction Documentation:** Provide clear guidance on which documentation requirements apply to school construction projects to eliminate unnecessary duplication.
5. **Integrated Building Maintenance Documentation:** Create a single documentation process for building maintenance that applies to all schools, including those under special management.

Comparative Analysis of Redundant Building Documentation Requirements in Title 20

Based on the provided knowledge entries, I can identify several instances where Title 20 creates overlapping or duplicative building documentation requirements that require schools to document the same information multiple times for different regulatory purposes:

1. School Building Usage and Closure Documentation

The provisions in IC 20-26-7-47 and related sections create multiple overlapping documentation requirements:

Primary Documentation Requirements:

- Schools must "conduct a review of school building usage" to determine underutilization
- Schools must annually report to the department "a listing of all buildings owned or leased by the school corporation that were originally designed as a school building"
- For each building, additional detailed information must be provided

Redundant Documentation Requirements:

- When a school building is identified as underutilized, schools must create **separate** documentation showing:
 - Historical usage documentation ("at any time the school building had been used for classroom instruction")
 - Current usage patterns for "the current school year and the two (2) school years immediately preceding"
 - Capacity analysis of other buildings to demonstrate "sufficient capacity to take the students"

- Travel time analysis showing buildings "that does not require more than twenty (20) minutes of travel time"

Administrative Office Usage Documentation:

- For buildings used as administrative offices, schools must document:
 - That "at least fifty percent (50%) of the square footage of the school building must be used for offices"
 - That "the personnel headquartered in the school building must consistently use the space for office purposes"
 - That "the occupancy cost of using the school building cannot be more than comparable office space that is available in the school district"

This creates multiple documentation streams for essentially the same building utilization information, requiring schools to report similar data in different formats for different regulatory purposes.

2. School Improvement Plan Building Documentation

The School Performance and Improvement Accountability regulations (511 IAC 6.2) create duplicative documentation requirements related to buildings:

Primary Documentation:

- Schools must include in their improvement plans "a provision to maintain a safe and disciplined learning environment for students and teachers"

Redundant Documentation:

- This safety documentation overlaps with other building safety documentation requirements elsewhere in Title 20
- Schools must separately document "a provision for the coordination of technology initiatives" which often includes building infrastructure documentation
- These requirements create parallel documentation processes for the same building safety and technology infrastructure information

4. Building Lease Documentation

The provisions in IC 20-47-4 create potentially redundant documentation for school building leases:

Primary Documentation:

- Schools must document lease agreements for "existing school building" which includes a "school building" or "building that after acquisition will be used as a school building"

Redundant Documentation:

- Schools must separately document that portable or relocatable buildings are not included in these agreements
- This creates separate documentation streams for what is essentially the same building information

5. Special Education Facility Documentation

Special education rules create additional layers of building documentation:

Primary Documentation:

- Schools must document the physical environment where special education services are provided

Redundant Documentation:

- Schools must separately document observations of students "in an environment appropriate for a student of that age"
- For evaluations, schools must document observations of "the student's academic performance in the general education classroom"
- This creates multiple documentation requirements for essentially the same physical spaces

6. Work-Based Learning Facility Documentation

The new diploma requirements create additional building-related documentation:

Primary Documentation:

- Schools must document "work based learning" environments which are defined as "real or simulated workplace settings"

Redundant Documentation:

- This documentation must include "a written partnership agreement and plan between the participant, parent or guardian, school, and employer partner"
- For the Employment Honors Seal, additional documentation of these same facilities is required
- This creates multiple documentation streams for the same physical locations

Recommendations for Streamlining

1. **Unified Building Usage Documentation System:** Create a single comprehensive building usage documentation process that satisfies all regulatory requirements rather than maintaining parallel processes.
2. **Consolidated Safety Documentation:** Establish a single building safety documentation process that satisfies both general education and special education requirements.

Streamlined Facility Reporting: Create a single reporting mechanism for all building-related information that can be used for multiple regulatory purposes.

3. **Coordinated Work-Based Learning Documentation:** Establish a single documentation process for work-based learning environments that satisfies both diploma requirements and program evaluation needs.